KAMALA D. HARRIS
Attorney General of California
MICHELLE DES JARDINS
Supervising Deputy Attorney General
CHRISTOPHER H. FINDLEY
Deputy Attorney General
State Bar No. 174972
600 West Broadway, Suite 1800
San Diego, CA 92101
P.O. Box 85266
San Diego, CA 92186-5266
Telephone: (619) 738-9541
Fax: (619) 645-2581
E-mail: Christopher.Findley@doj.ca.gov
Attorneys for Defendants
Scott Kernan and Guillermo Viera Rosa

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

CALIFORNIA REFORM SEX OFFENDER LAWS, a California Non-Profit Organization, and JOHN DOE, an individual,

Plaintiffs,

v.

SCOTT KERNAN, et al.,

Defendants.

Case No.: 3:15-cv-02295 JM (JMA)

JOINT MOTION TO DISMISS

[TO BE SUBMITTED]

Judge: Hon. Jeffrey T. Miller

Plaintiffs **CALIFORNIA REFORM SEX OFFENDER LAWS, a California Non-Profit Organization, JOHN DOE, an individual, and JAMES ROE, an individual** (Plaintiffs), and Defendants **SCOTT KERNAN AND GUILLERMO VIERA ROSA** (Defendants) have settled this case. Accordingly, the parties, through their respective counsels of record, move the Court under Federal Rule of Civil Procedure 41(a)(2) and Local Rule 7.2 to dismiss this action against Defendants with prejudice.

The parties stipulate that the Court shall retain jurisdiction to enforce the terms of the settlement agreement in accordance with the terms of the Settlement Agreement and Release. Any dispute regarding the settlement shall be brought before the Court within ninety days of the entry of the order dismissing this case. The jurisdiction of the Court to enforce the terms of the settlement agreement shall terminate within ninety days of the date of the order dismissing the case, unless either party moves to enforce within that time.

THE PARTIES SO STIPULATE.

Dated: September 13, 2016

s/ Janice M. Bellucci

Janice M. Bellucci
LAW OFFICE OF JANICE M. BELLUCCI, *Attorneys for Plaintiffs*

Dated: September 13, 2016

s/ Christopher H. Findley

CHRISTOPHER H. FINDLEY
Deputy Attorney General
Attorneys for Defendants Scott Kernan and Guillermo Viera Rosa

CHF:ab
SD2015802723
81435405.doc

CERTIFICATE OF SERVICE

Case Name: **California Reform Sex Offender Laws and John Doe v. CDCR, et al.** No. **3:15-cv-02295 JM (JMA)**

I hereby certify that on September 13, 2016, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

JOINT MOTION TO DISMISS

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on September 13, 2016, at San Diego, California.

A. Breault	A. Breault
Declarant	Signature

SD2015802723